



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

MEMORANDUM

Date: September 6, 2013

Subject: KMG-B Penta AL Technical Penta RQ/Pentachlorophenol UN 3155

PC Code: 063001

EPA Reg. No.: 61483-3

Document Type: Acute Toxicity Review

MRID Nos.: 49181402, 49181401

DP Barcode: 414399

Case No.: 2505

CAS No.: 87-86-5

40 CFR: 158.500

From: Jolene Trujillo, Biologist
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

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Date: 2013.09.12 07:38:18 -0400

To: Bonnie Adler, CRM
Risk Management and Implementation Branch V (7508P)
Pesticide Re-evaluation Division

Applicant: KMG-Bernuth, Inc.
9555 W. Sam Houston Pkwy. S. Suite 600
Houston, TX 77099

Formulation from Label:

	<u>% by wt.</u>
<u>Active Ingredient(s):</u>	
Pentachlorophenol.....	86.0%
Other Chlorophenols.....	10.0%
<u>Other Ingredient(s):</u>	4.0%
Total	100.0%

BACKGROUND: In response to the previous acute toxicity review (DP# 408186, 05/17/13, B. Yurchak), the registrant has submitted new toxicity studies for acute dermal toxicity and primary eye irritation to support the reregistration of their product EPA Reg. No. 61483-3. The MRID's are as follows: 491814-02 (81- 2) and 491814-01 (81-4). The studies were conducted by Product Safety Labs. The test material used in each of the studies was the subject product.

RECOMMENDATIONS:

- The acute toxicity studies submitted are acceptable to support the reregistration of EPA Reg. No. 61483-3.

The acute toxicity profile for EPA Reg. No. 61483-3 is currently:

Acute Oral	II	Cited
Acute Dermal	IV	Acceptable
Acute Inhalation	I	Cited
Primary Eye	II	Acceptable
Primary Dermal	III	Cited
Skin Sensitization	non sensitizer	Cited

NOTE: The acute toxicity requirements have been satisfied for the subject product.

LABELING:

ID #: EPA Reg. No.: 61483-3/ KMG-B Penta AL Technical Penta RQ/Pentachlorophenol UN 3155

RESTRICTED USE CLASSIFICATION REQUIRED

Due to Acute Inhalation Toxicity Category

SIGNAL WORD: DANGER-POISON -Skull & Crossbones required

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:*

Fatal if inhaled. Do not breathe dust. May be fatal if swallowed. Causes substantial but temporary eye injury. Do not get in eyes or on clothing. Avoid contact with skin.

*The designation of Personal Protective Equipment (PPE) for manufacturing use products does not fall under the jurisdiction of EPA, therefore, PPE has not been specified for this product.

FIRST AID:

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably mouth-to-mouth if possible. Call a poison control center or doctor for further treatment advice.

IF SWALLOWED: Call poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a

poison control center or doctor. Do not give anything by mouth to an unconscious person.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

NOTE TO PHYSICIAN:

Note to CRM/PM/Registrant:

The proposed label should contain a Note to Physician which addresses the toxicity category I for inhalation.

The following statements are some suggested types of information that could be included, if applicable, in the Note to Physician:

- technical information on symptomatology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

DATA EVALUATION RECORD

Product Reg. No.: 61483-3

Product Name: KMG-B Penta AL Technical Penta RQ/Pentachlorophenol UN 3155

1. DP BARCODE: 414399				
2. PC CODE: 063001				
3. CURRENT DATE September 6, 2013				
Study/Species/Lab Study # /Date	MRID	Results	Tox Cat	Grade
Acute dermal toxicity /rat/ Product Safety Labs- No. 36836/07-15-13 OCSPP 870.1200; OECD 402	49181402	Dermal LD ₅₀ > 5000 mg/kg (♀+♂) All animals survived exposure to the test substance and gained body weight during the study. . Dermal irritation noted at seven dose sites between days 1 and 11. No gross abnormalities were noted for any of the animals when necropsied at the conclusion of the 14-day observation.	IV	A
Primary eye irritation / rabbit / Product Safety Labs- No. 36835/07-18-13 OCSPP 870.2400; OECD 405	49181401	The test substance is severely irritating to the eye. Within one hour after instillation all three eyes exhibited corneal opacity and positive conjunctivitis. By 72 hours iritis also developed in two animals. The overall incidence and severity of irritation gradually decreased thereafter. All animals were free of ocular irritation by Day 21 (study termination).	II	A

Grade Key: A =Acceptable, U = Unacceptable, D = Data Gap